

CUI//PRIVILEGE

Document	Date	Bates Number Range
A. Documents Relevant to All Plaintiffs		
1. Excerpt of Spreadsheet Copy of NEH Active Grants (03.28.2025) MM_AW	03/28/2025	NEH-AR_00001
2. Excerpt of Spreadsheet Confirmation of Term Grants as of Apr. 2	04/07/2025	NEH-AR_00002
3. Excerpt of Spreadsheet NEH_ Biden Grants	03/12/2025	NEH-AR_00003
4. Excerpt of Spreadsheet NEH.Award.Data.2021-2025	03/21/2025	NEH-AR_00004
5. NEH Grant Termination_Internal Proc & Revocation of 3 Terminated Grants	04/07/2025	NEH-AR_00005
6. Confirmation of Terminated grants as of April 2, 2025 Linked document in email is item #2 above.	04/03/2025	NEH-AR_00008
7. Excerpt of Spreadsheet 2025-04-01 Active Awards	04/01/2025	NEH-AR_00009
8. Excerpt of Spreadsheet NEH-Awards-2025 Data Call	03/13/2025	NEH-AR_00010
9. NC email_NEH list of Biden Grants Linked document in email is item #3 above.	03/12/2025	NEH-AR_00011
10. BS email_NEH Active Awards_Grants Linked document in email is item #7 above.	04/01/2025	NEH-AR_00012-14

Controlled by National Endowment for the Humanities

CUI//PRIVILEGE

11. Question re: email address for EO deliverable Linked document in email is item #4 above.	03/21/2025	NEH-AR_00015-16
12. FW_TO REVIEW_Active Grants	03/31/2025	NEH-AR_00017-19
13. FW_NEH Active Awards_Grants	03/31/2025	NEH-AR_00020-21
14. Review criteria for reviewing all the awards Linked document in email is item #8 above.	02/07/2025	NEH-AR_00022-23
15. FW_historical review of grants Linked document in email is item #8 above.	03/13/2025	NEH-AR_00024-25
16. NEH April 24, 2025 Press Release – An Update on NEH Funding Priorities	04/24/2025	NEH-AR_00026-33
17. NEH Updates on NEH Priorities – Webpage last updated April 24, 2025	04/24/2025	NEH-AR_00034-38
B. Documents Relevant to Grant RQ-300297-25 to UCA Berkeley Plaintiff Robert Hirst		
1. Application	11/29/2023	NEH-AR_00039-119
2. Specific Terms and Conditions	07/14/2025	NEH-AR_00120-124
3. Offer Letter for RQ-300297-25	08/28/2024	NEH-AR_00125-126
4. Notice of Funding Opportunity for the Scholarly Editions and Scholarly Translations program.		NEH-AR_00127-166

CUI//PRIVILEGE

5. Notice of Grant Termination	04/02/2025	NEH-AR_00167
6. Award Reporting Requirements Schedule	07/14/2025	NEH-AR_00168
7. Award Notice of Action (NOA)	03/20/2025	NEH-AR_00169-170
8. Certification of Gifts	10/31/2024	NEH-AR_00171-172
9. Email transmitting Notice of Grant Termination	04/02/2025	NEH-AR_00173
C. Documents Related to Grant RZ-292650-23 to UCA Berkeley Plaintiff Christine Philliou		
1. Notice of Funding Opportunity for the Collaborative Research program.		NEH-AR_00174-213
2. Pre-Award Correspondence regarding the Budget and Institutional Grant Administrator (IGA) change.	09/21/2023	NEH-AR_00214-218
3. Revised Budget Justification	9/22/2023	NEH-AR_00219-221
4. Pre-Award Correspondence regarding IGA change.	09/15/2023	NEH-AR_00222-225
5. Application	11/29/2022	NEH-AR_00226-289
6. Revised Budget	9/22/2023	NEH-AR_00290-300

CUI//PRIVILEGE

7. Email transmitting Notice of Grant Termination	04/02/2025	NEH-AR_00301
8. Notice of Grant Termination	04/02/2025	NEH-AR_00302
9. Award Notice of Action (NOA)	09/22/2023	NEH-AR_00303
10. Specific Terms and Conditions	09/22/2023	NEH-AR_00304-308
11. Award Letter	9/22/2023	NEH-AR_00309
12. Award Reporting Requirements Schedule	09/14/2023	NEH-AR_00310

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

NEETA THAKUR, <i>et al.</i> ,)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 3:25-cv-4737
DONALD J. TRUMP, <i>et al.</i> ,)	
)	
Defendants.)	
)	
)	

DESIGNATION AND CERTIFICATION OF ADMINISTRATIVE RECORD

I, Elizabeth Voyatzis, hereby declare and certify as follows:

1. I am employed by the National Endowment for the Humanities (“NEH”) and serve as the Acting General Counsel for the Office of General Counsel (“OGC”). I have held this position since March 10, 2025.
2. I have worked at NEH since October 2007 in a variety of positions including Attorney Advisor and Deputy General Counsel.
3. As the Acting General Counsel, I am aware of the process by which the agency compiled the administrative record for determinations made since January 20, 2025, to terminate financial assistance awards to University of California (“UC”) institutions that no longer effectuate the priorities of President Trump’s administration, as set forth in the presidential memoranda on “Ending Radical And Wasteful Government DEI Programs and Preferencing,” dated January 20, 2025, “Ending Illegal Discrimination and Restoring Merit-Based Opportunity” dated January 21, 2025, and “Implementing The President’s ‘Department of Government Efficiency’ Cost Efficiency Initiative,” dated February 26, 2025.

4. To the best of my knowledge, information, and belief, the documents that have been labeled with Bates range NEH-AR_00001 through NEH-AR_00310 constitute the complete administrative record for the analysis and rationale that supported the termination of certain financial assistance awards to UC institutions, pursuant to the memoranda referenced above.

5. Each document in the administrative record is a true and correct copy of a record retained in the files of the NEH. I understand from counsel that the record will be filed on the Court's docket and served on the plaintiffs today.

In accordance with 28 U.S.C. § 1746 I hereby certify and declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on September 2, 2025, at Washington, D.C.

/s/ Elizabeth Voyatzis

Elizabeth Voyatzis